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October 29, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, Room TWB-204
Washington, DC 20554

> Re: *Application by Qwest Communications International, Inc. for Authorization to Provide In-Region InterLATA Services in the State of Arizona, Docket No. 03-194*

Dear Ms. Dortch:

On October 28, 2003, Rick Young, John Finnegan, Ken Wilson and I, all representing AT&T, met via conference call with Cathy Carpino, Daryll Cooper, Ken Lynch, Christi Shewman and Cecilia Seppings of the Commission staff. In particular, we discussed Qwest's policies with respect to the ordering and provisioning of DS1-capable loops and Qwest's failure to maintain adequate processes and procedures to ensure that defects in its software are corrected in a timely manner.

More specifically, AT&T reiterated that Qwest should be required to: (1) reinstate unequivocally -- and in writing -- its policy regarding DS1-capable loops that was in effect prior to June 16, 2003 (and that is still set forth in its SGAT), under which loop conditioning was classified as "incremental facility work" that Qwest performed for CLECs without assessing additional charges; and (2) commit that it will not alter that "pre-June 16" policy without the consent of the CLECs and the approval of the various State commissions in its region.

In regard to Qwest's failure to maintain adequate processes and procedures regarding the correction of software defects, AT&T discussed MCI's proposed amendment to the change management plan, which was vetoed by Qwest. MCI's proposed language includes the following: "Defect requests would be changes that correct problems discovered in production versions of an interface. These problems are where the interface is not working in accordance to the user requirements or the business rules published by Qwest. In addition, if functional requirements agreed upon by Qwest and the CLECs, results in inoperable functionality, even though software user requirements and business rules match; this will be addressed as a defect."[1]

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[1] MCI's proposal is Attachment 12 to AT&T's comments filed in WC Docket No. 03-194 on September 24, 2003.

MCI's proposal therefore would unequivocally require Qwest to "correct problems discovered in production versions of an interface," which are defined as problems "where the interface is not working in accordance to the user requirements or the business rules published by Qwest."   As AT&T has explained in its comments filed in this proceeding, this language would preclude Qwest from merely changing its documentation and leaving the underlying problem in the interface uncorrected. Consequently, Qwest should be required to incorporate the MCI proposal into the Change Management Process before its Application can be approved.

One electronic copy of this Notice is being submitted to the Secretary of the FCC in accordance with Section 1.1206 of the Commission's rules.

Sincerely,

Amy L. Alvarez

cc: Cathy Carpino
        Janice Myles
        Gary Remondino